Case: 4:24-cv-00708-MTS Doc. #: 4 Filed: 05/29/24 Page: 1 of 4 PageID #: 101



Recorded in the Ofo Recorder of Deeds Book 1 Page 53

Dormiunt Aliquando Leges, Nunquam Moriuntur

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UNITED STATES DISTRICT COURT for the Eastern District of Missouri

CREATED BY: RELATOR, Chief Eagle Eye In behalf of	Y
Ofo Band of the CASHBOX TRUST TRIBE's (Citizen) ANTONIA BEY & the U.S DOI & BIA	STATEMENT OF CLAIM
) DIVERSITY OF CITIZENSHIP
V.) FEDERAL QUESTION
FIRST NATIONAL BANK OF WATERLOO GREEN ENGINE LLC Christopher Mantese agent of MYSTERIA LLC) BREACH OF TREATY
) TRESPASS ON INDIAN COUNTRY
) CASE NO. 4:24-00708-MTS

05/28/2024

708

Motion to Amend Complaint in Bey v Mantese 4:24-00780-MTS

Dear UNITED STATES DISTRICT COURT for the Eastern District of Missouri,

- I, Antonia Bey, the petitioner in the above-captioned case, respectfully submit this motion to the court seeking leave to amend the complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. The grounds for this motion and the proposed amended complaint are as follows:
- 1. Background: The original complaint did not establish jurisdiction nor state proper claim(s).

Case: 4:24-cv-00708-MTS Doc. #: 4 Filed: 05/29/24 Page: 2 of 4 PageID #: 102



Recorded in the Ofo Recorder of Deeds Book 1 Page 53

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- 2. Reasons for Amendment: The amendment is necessary for clarification of existing claims, including but not limited to relief entitled to the petitioner. The clarified claims will detail the transgressions and violations of the guarantee to our people(The Cherokee Nation and all of its affiliated tribes) to quiet and peaceable possession of land in our country. As the Ofo Band and the Cashbox Trust Tribe and its Tribal Government have adopted all Treaties protecting our people's Country, I amend the original complaint in the spirit of equitable justice.
- **3. Proposed Amendments:** The petitioner requests redress for wrongs (committed against the petitioner by the respondants. These wrongs include but are not limited to, breach or treaty, use of confidence games, extortion, coercion and any other transgressions that encumberTribal Law and Tribal members' (sovereign citizens) self-determination and immunity from suit.
- **4. Legal Authority:** A party may amend his pleading once as a matter of course at any time before a responsive pleading is served or, if the pleading is one to which no responsive pleading is permitted and the action has not been placed on the trial calendar, he may so amend it at any time within 20 days after it is served. *Fed.R.Civ.P.* 15(a) (emphasis added). See, e.g., Foman v. Davis -Rule 15(a) mandates that leave to amend be freely given when justice requires, giving petitioner an opportunity to test claims on the merits)
- **5. Prejudice to Opposing Party:** These amendments fall within the guidelines of the above legal authority, ensuring no prejudice to the opposing party.
- **6. Good Faith:** I assert that the proposed amendments are made in good faith and not for the purpose of delay or harassment.
- **7. Conclusion:** Request that the court grant leave to file the amended complaint and provide any other relief deemed just and proper.

Case: 4:24-cv-00708-MTS Doc. #: 4 Filed: 05/29/24 Page: 3 of 4 PageID #: 103



Recorded in the Ofo Recorder of Deeds Book 1 Page 53

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Accordingly, petitioner respectfully requests that the Court grant this motion and allow petitioner to file the Amended Complaint. petitioner further requests that the Court grant such other and further relief as it deems just and proper.

Respectfully submitted,



Case: 4:24-cv-00708-MTS Doc. #: 4 Filed: 05/29/24 Page: 4 of 4 PageID #: 104



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4